

- Before the
- **FEDERAL COMMUNICATIONS COMMISSION**
- **Washington, D.C. 20554**

• In the Matter of	•)	•
•	•)	•
• Amendment of Part 97 of the	•)	•
• Amateur Radio Service Rules to	•)	• RM - 10786
• Morse Code Proficiency Testing	•)	•
• For All Classes of Amateur Licenses	•)	•
•	•)	•
• To: The Commission	•)	•

Comments Of Ronald J. Spicuzza – KB3EDF

- Times and technology have changed dramatically over the years, and all of the previously claimed reasons for requiring Morse proficiency of all amateur radio operators have disappeared.
 - Virtually no government or commercial radio service uses Morse telegraphy in today's world.
 - Thus, the historical need of the government, commercial, and maritime services for a "pool of (Morse) trained operators" has ceased to exist.
 - Morse Skill is no longer required for effective emergency communications by amateur operators
- I am not opposed to manual Morse code operation. But Morse code is just another mode and should not be afforded any special priority over others. It is available to those who wish to use it. Morse proficiency should not be required for those who do not wish to use the mode.
- Manual radiotelegraphy communications has been superceded by more modern, reliable, accurate, faster and efficient means of communication.
- Requiring manual telegraphy proficiency is not compatible with the radio amateur's mandated objective of contributing to the advancement of the radio art.
- No evidence exists that Morse proficiency is an indicator of a desirable, motivated or better qualified operator.
- The Morse code requirement serves as an advancement barrier to many otherwise qualified individuals.

- The value of Morse code communications in the Amateur Service is primarily recreational in nature and manual telegraphy proficiency should no longer be a compulsory licensing requirement for any class of Amateur Radio license
- Even the IARU recognizes that continuing Morse proficiency requirements is not in the best interest of the future of the amateur radio service.
- Since the Commission is no longer bound by an unwaivable requirement in the ITU Radio Regulations it can, and should, act promptly to remove an unnecessary, restrictive requirement.
- Other administrations (Switzerland, the United Kingdom, Belgium, Germany, The Netherlands, and Norway) have already eliminated Morse test requirements and many more are expected to follow suit rapidly.
- A morse proficiency test requirement is unnecessary and undesirable, in that:
 - It acts as a barrier to entry or advancement to otherwise qualified persons.
 - It is not necessarily indicative of an individual's ability to contribute to the advancement of the radio art.
 - It does not provide any indication of the examinee's good character, high intelligence, cooperative demeanor, or willingness to comply with the Commission's rules.
 - It no longer continues to serve a regulatory purpose.
 - It otherwise does not serve the public interest and necessity.
- In summary, for all of the reasons outlined and referenced herein, the Commission should enact the following changes to its rules *in the most expeditious manner possible*:
 - Eliminate the “Element 1” Morse test totally from the Commission's rules for all license classes.
 - Since the only testing distinction between the Technician class and the (grandfathered) Technician Plus class is the “Element 1” Morse Test, modify, as a consequential and logical change, the privileges afforded to Technician class licensees to be equivalent to those currently afforded to Technician Plus licensees and “Technician with Morse credit” licensees.

Respectfully submitted,

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